

SHER TREMONTE LLP

June 29, 2025

**VIA ECF AND EMAIL**

The Honorable Jennifer Willis  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Re: ***In the Matter of Extradition of Eran Hiya***, No. 24 MJ 1971 (JW)  
***United States v. Eran Hiya***, No. 24 CR 282 (VM)

Dear Judge Willis:

We write on behalf of our client, Eran Hiya, to propose a bail package that would meet the requirements indicated by the Court at the bail hearing on June 27, 2025. Because of the urgency of our request and the pending deadlines for filing Mr. Hiya's habeas petition, we respectfully request that the Court order the government to file a response to this letter by **close of business on Monday, June 30** and that the Court hold a bail hearing the morning of **Tuesday, July 1**.

We previously proposed that Mr. Hiya's bail would be secured by the residential property he owns in New Jersey and co-signed by his brother. The Court found that package was not sufficient. Accordingly, we propose that Mr. Hiya be released on the following conditions:

- A \$1 million bond, to be co-signed by three financial responsible persons, including Mr. Hiya's brother, his childhood friend, and a longtime friend of Mr. Hiya's family who has known Mr. Hiya for years.<sup>1</sup> All three suretors live and work in the United States.
- Security to be collateralized not only by Mr. Hiya's property in New Jersey, in which there is equity of approximately \$500,000, but also by a property in South Carolina owned by Mr. Hiya's family friend, which is worth approximately \$5.2 million, and on which there is currently a \$700,000 mortgage.
- To the extent the Court seeks further security, Mr. Hiya is prepared to deposit up to \$1 million cash with the Clerk of Court within a week of his release.

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<sup>1</sup> If the Court accepts the package, we will provide names and additional information about these individuals to the Court and the government.

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- Mr. Hiya's family will bring his two minor children to stay with their father in the United States one week a month (if Mr. Hiya's wife can get a visa to come with the children, they can all live here full time).
- Mr. Hiya will accept whatever additional conditions, such as home detention and electronic monitoring, that Pretrial Services can deploy and, if the Court wishes, will augment those resources with private security.

We respectfully submit that the foregoing combination of conditions is more than sufficient to ensure that Mr. Hiya will appear at future proceedings. We are available to respond to any inquiries the Court may have. We appreciate Your Honor's consideration.

Respectfully submitted,

/s/ Noam Biale

Noam Biale  
Wes Erdelack  
Krista Staropoli  
SHER TREMONTE LLP  
90 Broad St., 23rd Fl.  
New York, NY 10004  
(212) 202-2600  
nbiale@shertremonte.com

Justine A. Harris  
HARRIS TRZASKOMA LLP  
156 W. 56th St., Suite 2004  
New York, NY 10004  
(917) 685-5622  
jharris@harristrz.com

*Counsel for Eran Hiya*

cc: Dana McCann, Assistant United States Attorney (by ECF)  
James Mandilk, Assistant United States Attorney (by ECF)